

EXHIBIT A

(STATE COURT DOCUMENTS)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	Civil Action No. _____
)	
Mitchell Goff and Brooke Goff,)	
)	
Plaintiffs,)	
)	
vs.)	Summons
)	
Michael Clay; Keymont LLC; and)	
Beeline Carriers LLC)	
)	
Defendants.)	
_____)	

TO: DEFENDANT AND HIS COUNSEL

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint upon the subscriber, at 1544 Fording Island Rd, Suite A Hilton Head, South Carolina 29926 within thirty (30) days after the service hereof, exclusive of the day of service, and if you fail to answer the said Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief demanded in the Complaint, and judgment by default may be entered against you.

MORGAN &MORGAN

BY s/ Lauren Carroway, Esq.
 Lauren Heath Carroway
 SC Bar Number 72588
 1544 Fording Island Road, Suite A
 Hilton Head, South Carolina
 (854) 222-6075

Attorneys for Plaintiff

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	Civil Action No. _____
Mitchell Goff and Brooke Goff,)	
)	
Plaintiffs,)	
)	
vs.)	Complaint
)	
Michael Clay; Keymont LLC; and)	
Beeline Carriers LLC)	
)	
Defendants.)	
_____)	

NOW COMES Mitchell Goff and Brooke Goff, Plaintiffs in the above-captioned action, and submits their Complaint against the Defendants as follows:

Identity of Parties and Jurisdictional Allegations

1. Mitchell Goff is a citizen and resident of Casselberry, Florida. Plaintiff subjects himself to the jurisdiction of this Court by filing the present lawsuit.
2. Brooke Goff is a citizen and resident of Casselberry, Florida. Plaintiff subjects himself to the jurisdiction of this Court by filing the present lawsuit.
3. Upon information and belief, the Defendant Michael Clay is a resident of Savannah, Georgia who regularly travels to Jasper County, South Carolina for work.
4. Upon information and belief, the Defendant Keymont LLC is a limited liability corporation organized and existing under the laws of some state(s) other than South Carolina but each of which regularly and routinely transacts business, performs contracts, and operates within Jasper County, South Carolina.
5. Upon information and belief, the Defendant Beeline Carriers LLC is a limited liability corporation organized and existing under the laws of some state(s) other than South

Carolina but each of which regularly and routinely transacts business, performs contracts, and operates within Jasper County, South Carolina.

6. This is an action for negligence, negligence per se, and gross negligence regarding a motor vehicle accident which occurred in Jasper County.
7. This Court has jurisdiction over the parties and subject matter of this action.

Facts Common to All Counts

8. All preceding allegations are realleged as if fully repeated verbatim herein.
9. On or about October 28, 2021 at about 1:05 p.m., Mitchell Goff was driving South on I-95 in Jasper County, South Carolina.
10. Brooke Goff was a passenger in the car driven by Mitchell Goff.
11. At the same time and place, Defendant Clay caused his vehicle to strike Mitchell Goff's vehicle, resulting in bodily injuries to Mitchell Goff and Brooke Goff.

FOR A FIRST CAUSE OF ACTION
(Negligence/Negligence Per Se/Gross Negligence as to Defendant Clay)

8. All preceding allegations are realleged as if fully repeated verbatim herein.
9. Defendant Clay was negligent, willful, wanton, careless and grossly negligent at the time and place above-mentioned in one or more of the following particulars:
 - a) In following too closely in violation of South Carolina Code 15-5-1930;
 - b) In failing and omitting to keep a proper lookout while operating a motor vehicle under the circumstances then and there prevailing;
 - c) In failing and neglecting to keep the vehicle under proper control or so to control the same as to have avoided the collision;
 - d) In driving and operating said vehicle upon a public highway in the State of South Carolina without exercising the degree of care, caution and prudence in the

operation of said vehicle that a person of ordinary care, caution or prudence would have exercised under the same or similar circumstances;

- e) In driving a vehicle with reckless disregard of life and property in violation of the S.C. Code of Laws 56-5-1900.
 - f) In such other particulars that the evidence may establish.
10. The foregoing acts and omissions by the Defendant were the direct and proximate cause of Plaintiffs' injuries, resulting in Plaintiffs' conscious pain and suffering. Such said acts and omissions of the Defendant are in violation of the statutes and laws of the State of South Carolina.
11. As a direct and proximate result of Defendant's negligence, Plaintiff has sustained permanent injuries which have required medical treatment and related expenses, and Plaintiff has missed time at work resulting in lost wages.
12. Plaintiffs are informed and believe that they are entitled to judgment against the Defendant for actual damages and punitive damages as may be set by jury.

FOR A SECOND CAUSE OF ACTION

(Negligence as to Keymont LLC under Respondeat Superior)

13. The allegations of paragraphs 1-12 above are incorporated herein by reference as if each were fully restated verbatim.
14. On October 28, 2021, Defendant Clay was employed by Defendant Keymont LLC as a laborer and had at the time of the wreck, been given a job by Keymont LLC and put on the road by Keymont LLC, for the purpose of accomplishing Keymont LLC's duties and generating income for Keymont LLC.

15. On October 28, 2021 at the time of the wreck, Defendant Clay was operating his vehicle for the benefit of, and within the scope of his employment by, Defendant Keymont LLC.
16. Under the established legal doctrine of respondeat superior, Defendant Keymont LLC is liable for these acts of its employee, Clay, who was acting within the scope of his employment at the time of the wreck.

FOR A THIRD CAUSE OF ACTION

(Negligence as to Beeline Carriers LLC under Respondeat Superior)

13. The allegations of paragraphs 1-12 above are incorporated herein by reference as if each were fully restated verbatim.
14. On October 28, 2021, Defendant Clay was employed by Defendant Beeline Carriers LLC as a laborer and had at the time of the wreck, been given a job by Beeline Carriers LLC and put on the road by Beeline Carriers LLC, for the purpose of accomplishing Beeline Carriers LLC's duties and generating income for Beeline Carriers LLC.
15. On October 28, 2021 at the time of the wreck, Defendant Clay was operating his vehicle for the benefit of, and within the scope of his employment by, Defendant Beeline Carriers LLC.
16. Under the established legal doctrine of respondeat superior, Defendant Beeline Carriers LLC is liable for these acts of its employee, Clay, who was acting within the scope of his employment at the time of the wreck.

WHEREFORE, Plaintiffs are informed and believe they are entitled to a judgment against the Defendants and pray for judgment against the Defendants in such amount to be determined by

the trier of fact, together with punitive damages in an appropriate amount, the costs of this action and for such other and further relief as this court may deem proper.

MORGAN & MORGAN

By s/ Lauren Carroway, Esq.

Lauren Heath Carroway

SC Bar Number 72588

1544 Fording Island Road, Suite A

Hilton Head, South Carolina

(854) 222-6075

Attorneys for Plaintiff

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	Civil Action No. 2022-CP-27-420
)	
Mitchell Goff and Brooke Goff,)	
)	
Plaintiff,)	
)	
vs.)	CERTIFICATE OF MAILING
)	
Michael Clay, Keymont, LLC and)	
Beeline Carriers, LLC)	
)	
Defendants.)	
)	

I, the undersigned, do hereby state that on the 14th day of September, 2022, I mailed a true and accurate copy of the First Set of Interrogatories, First Set of Requests for Production and First Set of Requests to Admit to:

Michael Godbee
 223 Lake View Drive
 Pooler, Georgia 31322
Management Agent/Member of Keymont, LLC

Said mailing was perfected via the United States Postal Service, with proper postage affixed.

MORGAN & MORGAN

BY s/ Lauren Carroway, Esq.
 Lauren Heath Carroway
 SC Bar Number 72588
 1544 Fording Island Road, Suite A
 Hilton Head, South Carolina
 (854) 222-6075

Attorneys for Plaintiff

Hilton Head, South Carolina
 September 14, 2022

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	Civil Action No. 2022-CP-27-420
)	
Mitchell Goff and Brooke Goff,)	
)	
Plaintiff,)	
)	
vs.)	CERTIFICATE OF MAILING
)	
Michael Clay, Keymont, LLC and)	
Beeline Carriers, LLC)	
)	
Defendants.)	
)	

I, the undersigned, do hereby state that on the 14th day of September, 2022, I mailed a true and accurate copy of the First Set of Interrogatories, First Set of Requests for Production and First Set of Requests to Admit to:

Michael Godbee
 223 Lake View Drive
 Pooler, Georgia 31322
Management Agent/Member of Beeline Carriers, LLC

Said mailing was perfected via the United States Postal Service, with proper postage affixed.

MORGAN &MORGAN

BY s/ Lauren Carroway, Esq.
 Lauren Heath Carroway
 SC Bar Number 72588
 1544 Fording Island Road, Suite A
 Hilton Head, South Carolina
 (854) 222-6075

Attorneys for Plaintiff

Hilton Head, South Carolina
 September 14, 2022

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	CIVIL ACTION NO.: 2022-CP-27-420
Mitchell Goff and Brooke Goff,)	
)	
Plaintiffs,)	
)	
vs.)	AMENDED SUMMONS
)	
MICHAEL CLAY and BEELINE)	
CARRIERS, LLC,)	
)	
Defendants.)	
_____)	

TO: DEFENDANT AND HIS COUNSEL:

YOU ARE HEREBY SUMMONED and required to answer the Amended Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Amended Complaint upon the subscriber, at 1544 Fording Island Rd., Suite A, Hilton Head, South Carolina 29926 within thirty (30) days after the service hereof, exclusive of the day of service, and if you fail to answer the said Amended Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief demanded in the Amended Complaint, and judgment by default may be entered against you.

MORGAN & MORGAN

BY: s/Lauren Carroway, Esq.
 Lauren Heath Carroway
 SC Bar Number 72588
 1544 Fording Island Road, Suite A
 Hilton Head, South Carolina 29926
 (854) 222-6075

Hilton Head, South Carolina
 September 21, 2022

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF JASPER)	CIVIL ACTION NO.: 2022-CP-27-420
Mitchell Goff and Brooke Goff,)	
)	
Plaintiffs,)	
)	
vs.)	AMENDED COMPLAINT
)	
MICHAEL CLAY and BEELINE)	
CARRIERS, LLC,)	
)	
Defendants.)	
)	

NOW COMES Mitchell Goff and Brooke Goff, Plaintiffs in the above-captioned action, and submits their Amended Complaint against the Defendants as follows:

Identity of Parties and Jurisdictional Allegations

1. Mitchell Goff is a citizen and resident of Casselberry, Florida. Plaintiff subjects himself to the jurisdiction of this Court by filing the present lawsuit.
2. Brooke Goff is a citizen and resident of Casselberry, Florida. Plaintiff subjects herself to the jurisdiction of this Court by filing the present lawsuit.
3. Upon information and belief, the Defendant, Michael Clay, is a resident of Savannah, Georgia who regularly travels to Jasper County, South Carolina for work.
4. Upon information and belief, the Defendant Beeline Carriers, LLC is a limited liability corporation organized and existing under the laws of some state(s) other than South Carolina but each of which regularly and routinely transacts business, performs contracts, and operates within Jasper County, South Carolina.
5. This is an action for negligence, negligence per se and gross negligence regarding a motor vehicle accident which occurred in Jasper County.

6. This Court has jurisdiction over the parties and subject matter of this action.

Facts Common to All Counts

7. All preceding allegations are realleged as if fully repeated verbatim herein.

8. On or about October 28, 2021 at about 1:05 p.m., Mitchell Goff was driving South on I-95 in Jasper County, South Carolina.

9. Brooke Goff was a passenger in the car driven by Mitchell Goff.

10. At the same time and place, Defendant Clay caused his vehicle to strike Mitchell Goff's vehicle, resulting in bodily injuries to Mitchell Goff and Brooke Goff.

FOR A FIRST CAUSE OF ACTION

(Negligence/Negligence Per Se/Gross Negligence as to Defendant Clay)

11. All preceding allegations are realleged as if fully repeated verbatim herein.

12. Defendant Clay was negligent, willful, wanton, careless and grossly negligent at the time and place above-mentioned in one or more of the following particulars:

- a) In following too closely in violation of South Carolina Code §15-5-1930;
- b) In failing and omitting to keep a proper lookout while operating a motor vehicle under the circumstances then and there prevailing;
- c) In failing and neglecting to keep the vehicle under proper control or so to control the same as to have avoided the collision;
- d) In driving and operating said vehicle upon a public highway in the State of South Carolina without exercising the degree of care, caution and prudence in the operation of said vehicle that a person of ordinary care, caution and prudence would have exercised under the same or similar circumstances;
- e) In driving a vehicle with reckless disregard of life and property in violation of the S.C. Code of Laws §56-5-1900.

f) In such other particulars that the evidence may establish.

13. The foregoing acts and omissions by the Defendant were the direct and proximate cause of Plaintiffs' injuries, resulting in Plaintiffs' conscious pain and suffering. Such said acts and omissions of the Defendant are in violation of the statutes and laws of the State of South Carolina.
14. As a direct and proximate result of Defendant's negligence, Plaintiffs have sustained permanent injuries which have required medical treatment and related expenses, and Plaintiffs have missed time at work resulting in lost wages.
15. Plaintiffs are informed and believe that they are entitled to judgment against Defendant for actual damages and punitive damages as may be set by jury.

FOR A SECOND CAUSE OF ACTION
(Negligence as to Beeline Carriers, LLC under Respondeat Superior)

16. The allegations of paragraphs 1 – 15 above are incorporated herein by reference as if each were fully restated verbatim.
17. On October 28, 2021, Defendant Clay was employed by Defendant Beeline Carriers, LLC as a laborer and had at the time of the wreck, been given a job by Beeline Carriers, LLC and put on the road by Beeline Carriers, LLC for the purpose of accomplishing Beeline Carrier LLC's duties and generating income for Beeline Carriers, LLC.
18. On October 28, 2021 at the time of the wreck, Defendant Clay was operating his vehicle for the benefit of, and within the scope of his employment by, Defendant Beeline Carriers, LLC.
19. Under the established legal doctrine of respondeat superior, Defendant Beeline Carriers, LLC is liable for these acts of its employee, Clay, who was acting within the scope of his employment at the time of the wreck.

WHEREFORE, Plaintiffs are informed and believe they are entitled to a judgment against the Defendants and pray for judgment against the Defendants in such amount to be determined by the trier of fact, together with the punitive damages in an appropriate amount, the costs of this action and for such other and further relief as this court may deem proper.

MORGAN & MORGAN

BY: s/Lauren Carroway, Esq.
Lauren Heath Carroway
SC Bar Number 72588
1544 Fording Island Road, Suite A
Hilton Head, South Carolina 29926
(854) 222-6075

Hilton Head, South Carolina
September 21, 2022